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February 25, 2021

Via ECF

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York

**Re:** *Dedra De La Rosa v. Pure Green NYC 8th Street Corp*

**Docket No. 1:18-cv-03456 (AJN)(GWG)**

Dear Judge Nathan:

We represent the plaintiff in the above-entitled action. We write to respectfully ask the Court to extend the deadline for the pretrial submissions from February 25, 2021 to March 18, 2021. The reason for this request is that plaintiff just received today, at 1:30 PM, the defendant's modifications to plaintiff's proposed pretrial submissions. Because plaintiff does not agree with many of the defendant's modifications, plaintiff respectfully asks for the additional time to try to resolve the disagreement. And, in the event that the parties cannot agree, then the parties will need this additional time to submit a pretrial submission in compliance with Rule 6. D. of Your Honor's Individual Practices in Civil Cases ("For any requests to charge on which the parties cannot agree, each party should clearly set forth its proposed charge, as well as the grounds on which the Court should use that charge and should include citations to supporting case law sufficient to enable the Court to render a decision."). Plaintiff has asked defense counsel if they consent to this application but has not received a response.

Moreover, pursuant to Your Honor's Order of February 16, 2021, we write to advise the Court the parties propose the following trial dates: the weeks of September 13, 2021 and/or September 20, 2021. Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.